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DOC # _____
DATE FILED: 7/9/2020

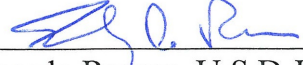
CMD
CARMEL, MILAZZO & DICHARA LLP
ATTORNEYS AT LAW

July 9, 2020

Via ECF

Hon. Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square
Courtroom 619
New York, New York 10007

The application is X granted
_____ denied


Edgardo Ramos, U.S.D.J.
Dated: 7/9/2020
New York, New York

Re: Sharbat et al. v. Iovance Biotherapeutics, Inc. et al.
Case No. 1:20-cv-01391-JM
Request for Extension on Consent

Dear Judge Ramos:

MEMO ENDORSED

This firm represents Plaintiffs Solomon Sharbat (“Sharbat”), Solomon Capital LLC (“SC”), Solomon Capital 401k Trust (“The Trust”), and Shalhav Raff (“Raff”) (collectively referred to herein as the “Plaintiff”) in the above-referenced action. I respectfully submit letter in request of an extension of time within which Plaintiffs may submit opposition to the motions of Defendants Iovance Biotherapeutics, Inc. f/k/a Lion Biotechnologies Inc. f/k/a Genesis Biopharma Inc. (“Iovance”) and Manish Singh (“Singh”) (collectively referred to herein as the “Defendants”) to dismiss the case.

This letter is submitted after the parties have conferred, agreed, and consented to the extension request set forth.

Iovance filed a motion to dismiss on May 22, 2020 (DKT#18).

On June 3, 2020, after service was made on Defendant Singh, counsel for Defendants filed a letter seeking an extension of time in which to respond to the Amended Complaint and bring a motion to dismiss. (DKT#19) Plaintiffs both consented to that request and consented to the request for leave to file same without a pre-motion conference. The Defendants also agreed that Plaintiffs’ opposition to Iovance’s motion, originally due June 12, 2020, would be extended and simultaneously due on July 10, 2020.

The parties agreed to a briefing schedule of June 19, 2020 for Defendant Singh’s motion to be filed, opposition to the motions of both Defendants to be due on July 10, 2020, and any reply to be due on July 24, 2020.

As such, Plaintiff’s opposition is currently due on July 10, 2020. However, Plaintiffs seek a brief one week extension of this date such that its opposition be due on July 17, 2020. In addition, the parties agree that Defendants shall have three weeks within which to submit their reply, making a due date for any reply August 7, 2020. The reason for the request is that during the shutdown and quarantine due to the global pandemic, many dates for cases in which the undersigned is active had been moved to July, some as more or less place holders. However, July has turned out to be the month in which business has resumed near normal operation and those dates have thus remained. As such there has been a tremendous volume of work in the past two weeks which has all been under very short turnaround times. In short, the undersigned’s litigation workload has

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been excessive and the undersigned requires additional time to prepare an opposition to be fairly determined on the merits, instead of one being completed in a short time frame.

Plaintiffs have not made any prior requests of This Honorable Court for such extensions on these motion, except as noted above.

Counsel for Defendants has graciously consented to same, provided that Defendants' replies will be due on August 7.

Respectfully submitted,

Claudio Simpkins